

# **EXHIBIT T**

**From:** Jared Placitella <[jmplacitella@cprlaw.com](mailto:jmplacitella@cprlaw.com)>

**Date:** May 1, 2018 at 10:17:35 AM EDT

**To:** jquinn <[jquinn@rwmlegal.com](mailto:jquinn@rwmlegal.com)>, "Rivera-Soto, Roberto A." <[RiveraSotoR@ballardspahr.com](mailto:RiveraSotoR@ballardspahr.com)>

**Cc:** Chris Placitella <[cplacitella@cprlaw.com](mailto:cplacitella@cprlaw.com)>, "Harry M. Roth" <[HRoth@cprlaw.com](mailto:HRoth@cprlaw.com)>, Michael Coren <[MCoren@cprlaw.com](mailto:MCoren@cprlaw.com)>, Robert Pratter <[RPratter@cprlaw.com](mailto:RPratter@cprlaw.com)>, "Eric S. Pasternack" <[epasternack@cprlaw.com](mailto:epasternack@cprlaw.com)>, eassaf <[eassaf@kirkland.com](mailto:eassaf@kirkland.com)>, "Williams, Michael F." <[mwilliams@kirkland.com](mailto:mwilliams@kirkland.com)>, "Bress, Daniel A." <[dbress@kirkland.com](mailto:dbress@kirkland.com)>, pfarrell <[pfarrell@kirkland.com](mailto:pfarrell@kirkland.com)>, Elizabeth Dalmut <[elizabeth.dalmut@kirkland.com](mailto:elizabeth.dalmut@kirkland.com)>, "Anguas, Ronald K." <[ronald.anguas@kirkland.com](mailto:ronald.anguas@kirkland.com)>, gussackn <[gussackn@pepperlaw.com](mailto:gussackn@pepperlaw.com)>, boiseb <[boiseb@pepperlaw.com](mailto:boiseb@pepperlaw.com)>, "\*hickokr@pepperlaw.com" <[hickokr@pepperlaw.com](mailto:hickokr@pepperlaw.com)>, stioa <[stioa@pepperlaw.com](mailto:stioa@pepperlaw.com)>, etunis <[etunis@heroldlaw.com](mailto:etunis@heroldlaw.com)>, kmarino <[kmarino@khmarino.com](mailto:kmarino@khmarino.com)>, jboyle <[jboyle@khmarino.com](mailto:jboyle@khmarino.com)>, "Reiley, William" <[ReileyW@ballardspahr.com](mailto:ReileyW@ballardspahr.com)>, rdonaher <[rdonaher@heroldlaw.com](mailto:rdonaher@heroldlaw.com)>

**Subject:** RE: Williams, et al. v. BASF Catalysts LLC, et al., Case No. 11-1754 (JLL) (JAD)

Dear Justice Rivera-Soto,

Plaintiffs respond to BASF's request for oral argument on Plaintiffs' motion (ECF 477). As BASF has already submitted an *ex parte* submission, oral argument and further *ex parte* submission on this matter is unnecessary. The motion is fully briefed and should, as the Court we believe was initially inclined to do, be decided on the papers.

Respectfully submitted,

Jared M. Placitella, Esquire

**C / P / R**

Cohen, Placitella & Roth, P.C.

Two Commerce Square

[2001 Market Street, Suite 2900 / Philadelphia, PA 19103](https://www.cprlaw.com)

[215.567.3500](tel:215.567.3500) / [215.567.6019](tel:215.567.6019) (fax)

<http://www.cprlaw.com>

IMPORTANT CONFIDENTIALITY NOTICE

PRIVILEGED ATTORNEY/CLIENT COMMUNICATION AND/OR ATTORNEY WORK PRODUCT. This message and attachments may contain privileged and confidential information. If you are not an intended recipient of this message, any use, distribution or copying is prohibited; please notify Cohen, Placitella & Roth, P.C. immediately at (215) 567-3500 or by email reply; and permanently delete all copies.

**From:** Justin Quinn <[JQuinn@rwmlegal.com](mailto:JQuinn@rwmlegal.com)>

**Sent:** Tuesday, May 1, 2018 9:34 AM

**To:** Rivera-Soto, Roberto A. <[RiveraSotoR@ballardspahr.com](mailto:RiveraSotoR@ballardspahr.com)>

**Cc:** [cplacitella@cprlaw.com](mailto:cplacitella@cprlaw.com); [HRoth@cprlaw.com](mailto:HRoth@cprlaw.com); [mcoren@cprlaw.com](mailto:mcoren@cprlaw.com); [rpratter@cprlaw.com](mailto:rpratter@cprlaw.com); [jmplacitella@cprlaw.com](mailto:jmplacitella@cprlaw.com); Eric S. Pasternack ([epasternack@cprlaw.com](mailto:epasternack@cprlaw.com)) <[epasternack@cprlaw.com](mailto:epasternack@cprlaw.com)>; Assaf, Eugene F. <[eassaf@kirkland.com](mailto:eassaf@kirkland.com)>; Williams, Michael F. <[mwilliams@kirkland.com](mailto:mwilliams@kirkland.com)>; Bress, Daniel A. <[dbress@kirkland.com](mailto:dbress@kirkland.com)>; Farrell, Peter A. <[pfarrell@kirkland.com](mailto:pfarrell@kirkland.com)>; Dalmut, Elizabeth

<[elizabeth.dalmut@kirkland.com](mailto:elizabeth.dalmut@kirkland.com)>; Anguas, Ronald K. <[ronald.anguas@kirkland.com](mailto:ronald.anguas@kirkland.com)>;  
[gussackn@pepperlaw.com](mailto:gussackn@pepperlaw.com); [boiseb@pepperlaw.com](mailto:boiseb@pepperlaw.com); [\\*hickokr@pepperlaw.com](mailto:*hickokr@pepperlaw.com)  
<[hickokr@pepperlaw.com](mailto:hickokr@pepperlaw.com)>; [stioa@pepperlaw.com](mailto:stioa@pepperlaw.com); [etunis@heroldlaw.com](mailto:etunis@heroldlaw.com); [kmarino@khmarino.com](mailto:kmarino@khmarino.com);  
[jboyle@khmarino.com](mailto:jboyle@khmarino.com); Reiley, William <[ReileyW@ballardspahr.com](mailto:ReileyW@ballardspahr.com)>; Robert J. Donaher  
<[rdonaher@heroldlaw.com](mailto:rdonaher@heroldlaw.com)>

**Subject:** Williams, et al. v. BASF Catalysts LLC, et al., Case No. 11-1754 (JLL) (JAD)

Dear Justice Rivera-Soto,

With respect to plaintiffs' motion to compel certain documents that plaintiffs claim are not privileged, ECF No. 477, BASF respectfully requests oral argument on the motion. Because it will be necessary for BASF to discuss privileged information, at least part of this oral argument would need to take place *in camera* and *ex parte*.

Respectfully submitted,

Justin Quinn

Justin T. Quinn, Esq.  
ROBINSON MILLER LLC  
One Newark Center, 19th Floor  
Newark, NJ 07102  
e-mail: [jquinn@rwmlegal.com](mailto:jquinn@rwmlegal.com)  
telephone: 973-690-5400  
facsimile: 973-466-2760  
website: [www.rwmlegal.com](http://www.rwmlegal.com)



CONFIDENTIALITY NOTICE: This e-mail contains confidential and legally privileged information which is intended only for the use of the recipient(s) named above. If you receive this e-mail in error, please notify us immediately by reply e-mail and delete this message.